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Attorneys for Sonos, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GOOGLE LLC.,

Plaintiff,

vs.

SONOS, INC.,

Defendant.

CASE NO. 3:20-cv-06754-WHA
Related to CASE NO. 3:21-cv-07559-WHA

**STIPULATED REQUEST FOR ORDER
EXTENDING EXPERT REPORT AND
DISCOVERY DEADLINES**

Pursuant to Civil Local Rule 6-2, Google LLC (“Google”) and Sonos, Inc. (“Sonos”) (collectively, “the Parties”) jointly stipulate and request an order extending the expert report and discovery deadlines in accordance with the stipulated schedule set forth herein.

WHEREAS, the Parties have met and conferred in good faith and agreed, subject to the Court’s approval, that extensions of the below expert report and discovery dates are necessary and desirable to accommodate the availability of the Parties’ expert witnesses and to ensure adequate time for them to prepare their rebuttal and reply reports;

WHEREAS, the Parties agree that continuing the deadlines for expert reports and discovery will not affect the Parties’ ability to comply with the other deadlines set forth in this case;

THE PARTIES HEREBY STIPULATE, AGREE, AND REQUEST, that the Court modify pretrial deadlines as follows:

Event	Current Deadline Set Forth in Case Management Order (Dkt. 67)	Proposed Deadline
Deadline for rebuttal expert reports	December 14, 2022	December 23, 2022
Deadline for reply expert reports	December 21, 2022	January 5, 2023
Deadline for bringing discovery motions or extension motions based on discovery violations for expert discovery	December 23, 2022	January 13, 2023
Deadline for expert discovery ¹	January 4, 2023	January 20, 2023

The Parties submit the accompanying declaration of James Judah in support hereof and respectfully request that the Court enter the attached proposed order.

IT IS SO STIPULATED.

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¹ The parties have agreed that the deposition of Google’s damages expert, Christopher Bakewell, may take place during the week of January 23, 2022 to accommodate Mr. Bakewell’s trial schedule.

1 Dated: November 11, 2022

Respectfully submitted,

2 /s/ James Judah

/s/ Cole Richter

3 Attorneys for GOOGLE LLC

Attorneys for SONOS, INC.

4 QUINN EMANUEL URQUHART &
SULLIVAN, LLP

LEE SULLIVAN SHEA & SMITH LLP

5 *Counsel for Google LLC*

Counsel for Sonos, Inc.

ECF ATTESTATION

I, James Judah, am the ECF User whose ID and password are being used to file this Joint Stipulation. In compliance with Civil Local Rule 5-1, I hereby attest that Cole Richter, counsel for Sonos, has concurred in this filing.

Dated: November 11, 2022

By: /s/ James Judah
James Judah

[PROPOSED] ORDER

The Court, having considered the Stipulated Request for Order Extending Expert Report and Discovery Deadlines, finds there is good cause to order the deadlines as follows:

Event	Current Deadline Set Forth in Case Management Order (Dkt. 67)	Proposed Deadline
Deadline for rebuttal expert reports	December 14, 2022	December 23, 2022
Deadline for reply expert reports	December 21, 2022	January 5, 2023
Deadline for bringing discovery motions or extension motions based on discovery violations for expert discovery	December 23, 2022	January 13, 2023
Deadline for expert discovery ²	January 4, 2023	January 20, 2023

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____, 2022 By: _____

Hon. William Alsup
United States District Judge

² The parties have agreed that the deposition of Google's damages expert, Christopher Bakewell, may take place during the week of January 23, 2022 to accommodate Mr. Bakewell's trial schedule.